

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**PETER PEDERSEN,**

**Plaintiff,**

**v.**

**ZOHO CORPORATION.,**

**Defendant.**

**Case No. 6:22-cv-00408-ADA**

**JURY TRIAL DEMANDED**

**PLAINTIFF PETER PEDERSEN'S RESPONSE TO ZOHO'S IMPROPER FILING OF  
NOTICE OF NONOPPOSITION TO MOTION TO TRANSFER**

On October 20, 2022, Zoho filed the present motion to transfer venue to the Austin Division (Zoho's Motion).<sup>1</sup> Pedersen initially filed a Notice of Venue Discovery.<sup>2</sup> That filing reset the date of Pedersen's response to Zoho's Motion to January 5, 2023. The response was drafted and ready to file on January 5, 2023. However, it was mistakenly not filed until January 6, 2023. Counsel for Plaintiff contacted Counsel for Defendant to request an extension of one day but was rejected even though Plaintiff allowed Defendant a waiver of service<sup>3</sup> thereby granting a 60-day extension of time to answer.

Regardless, Defendant's Notice of Non-Opposition is incorrect. Plaintiff did oppose by filing a Notice of Venue Discovery.<sup>4</sup> However, in preparing the discovery, Plaintiff determined

---

<sup>1</sup> Doc. No. 14.

<sup>2</sup> Doc. No. 15.

<sup>3</sup> Doc. No. 5.

<sup>4</sup> Doc. No. 15.

discovery was not needed and instead Plaintiff responded to the Motion to Transfer.<sup>5</sup> Therefore, the Motion is opposed and Defendant's filing is misleading.

## I. CONCLUSION

For the reasons provided in Pedersen's Response,<sup>6</sup> Zoho's motion to transfer this case to the Austin Division should be denied as it is not clearly more convenient for this case to proceed in the Austin Division.

Dated: January 18, 2023

Respectfully Submitted

**Ramey LLP**

/s/William P. Ramey, III  
William P. Ramey, III  
Texas Bar No. 24027643  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
wramey@rameyfirm.com

*Attorneys for Peter Pedersen*

## **CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of January 18, 2023, with a copy of the foregoing via ECF.

/s/ William P. Ramey, III  
William P. Ramey, III

---

<sup>5</sup> Doc. No. 16.

<sup>6</sup> Doc. No. 16.